

## Baxter Krutsch - 2/12/2021

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| 1 | <p>1 IN THE UNITED STATES DISTRICT COURT</p> <p>2 FOR THE EASTERN DISTRICT OF TEXAS</p> <p>3 SHERMAN DIVISION</p> <p>4 MARK RAKOWSKI, *</p> <p>5 Plaintiff, *</p> <p>6 vs. * Civil Action</p> <p>7 No. 4:19-cv-0883-ALM</p> <p>8 LENNOX INTERNATIONAL, *</p> <p>9 INC., *</p> <p>10 Defendant. *</p> <p>11 *****</p> <p>12 ORAL AND VIDEOTAPED DEPOSITION OF</p> <p>13 BAXTER KRUTSCH,</p> <p>14 INDIVIDUALLY AND AS CORPORATE REPRESENTATIVE OF</p> <p>15 LENNOX INTERNATIONAL, INC.</p> <p>16 FEBRUARY 12, 2021</p> <p>17 (Conducted Remotely via Zoom)</p> <p>18 *****</p> <p>19 ORAL AND VIDEOTAPED DEPOSITION OF BAXTER KRUTSCH,</p> <p>20 produced as a witness at the instance of the Plaintiff,</p> <p>21 and duly sworn, was taken in the above-styled and</p> <p>22 -numbered cause on the 12th day of February, 2021, from</p> <p>23 9:32 a.m. to 5:19 p.m., before Cindy Dutsch, CSR, RPR in</p> <p>24 and for the State of Texas, reported by machine</p> <p>25 shorthand, with the witness located in Clinton, Utah,</p> <p>26 pursuant to the Federal Rules of Civil Procedure, the</p> <p>27 Emergency Orders regarding the COVID-19 State of</p> <p>28 Disaster, and any provisions, if any, stated on the</p> <p>29 record.</p> | 3 |
| 2 | <p>1 A P P E A R A N C E S</p> <p>2 (Appearing remotely)</p> <p>3</p> <p>4 FOR THE PLAINTIFF:</p> <p>5 Mr. Brian P. Sanford</p> <p>6 Ms. Elizabeth "BB" Sanford</p> <p>7 THE SANFORD FIRM</p> <p>8 1910 Pacific Avenue</p> <p>9 Suite 15400</p> <p>10 Dallas, Texas 75201</p> <p>11 (214) 717-6653 (telephone)</p> <p>12 (214) 919-0113 (facsimile)</p> <p>13 bsanford@sanfordfirm.com</p> <p>14 esanford@sanfordfirm.com</p> <p>15</p> <p>16 FOR THE DEFENDANT:</p> <p>17 Mr. Brian Jorgensen</p> <p>18 Ms. Victoria L. Bliss</p> <p>19 JONES DAY</p> <p>20 2727 North Harwood Street</p> <p>21 Dallas, Texas 75201</p> <p>22 (214) 220-3939 (telephone)</p> <p>23 (214) 969-5100 (facsimile)</p> <p>24 bmjorgensen@jonesday.com</p> <p>25 vbliss@jonesday.com</p> <p>26</p> <p>27 ALSO PRESENT:</p> <p>28 Mr. Mark Rakowski</p> <p>29 Ms. Jodie Michalski</p>   | 4 |

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| <p style="text-align: right;">13</p> <p>1 discrimination and retaliation, and investigating<br/>2 reports of discrimination and retaliation, true?<br/>3 A. True.<br/>4 Q. And Item 62, you're the company person to<br/>5 speak on training of plaintiff's supervisors to<br/>6 recognize and prevent discrimination and retaliation in<br/>7 the workplace, true?<br/>8 A. True.<br/>9 Q. And lastly, you're the company person to speak<br/>10 on steps taken to protect plaintiff from discrimination,<br/>11 true?<br/>12 A. True.<br/>13 Q. And the plaintiff in this case is Mark<br/>14 Rakowski, true?<br/>15 A. True.<br/>16 Q. Now, I know you're not designated, and so I --<br/>17 I need to make a distinction. So you're speaking on<br/>18 behalf of the company for those topics, but I'm also<br/>19 asking you questions individually, as a witness, to the<br/>20 extent you're not speaking on those.<br/>21 And so what I'll -- I'll try to delineate<br/>22 that, and if you can help me delineate that. If I'm<br/>23 asking something and you want to say, look, this is just<br/>24 me personally, I'm not speaking on behalf of the<br/>25 company --</p>  | <p style="text-align: right;">15</p> <p>1 do I know that?<br/>2 Q. Yes.<br/>3 A. My role at the -- at the time as the HR<br/>4 director of Allied Air Enterprises was involved in the<br/>5 process of observing personally, receiving and providing<br/>6 feedback in regards to the matter, and evaluation of the<br/>7 decision process that -- that ultimately resulted in the<br/>8 termination of Mark Rakowski.<br/>9 Q. So tell me about that.<br/>10 What did you observe personally<br/>11 about -- about Mark Rakowski's leadership?<br/>12 A. I mean, yeah, a -- a specific example or do<br/>13 you want me to just give you an example or two that<br/>14 I -- that I observed?<br/>15 Q. Sure, give me a specific example.<br/>16 A. Say -- so personally observed a -- an<br/>17 inability and desire to work and align with the -- the<br/>18 local vice president/general manager of the business,<br/>19 upon which he supported, regarding staying aligned and<br/>20 understanding what the desire -- what the needs and<br/>21 what the support from -- his team needed to be<br/>22 successful.<br/>23 I received feedback from members of the<br/>24 tech support team, under which Mark was the leader of,<br/>25 on several instances that -- upon the time which he</p> |
| <p style="text-align: right;">14</p> <p>1 A. Okay.<br/>2 Q. -- please tell me as well, all right?<br/>3 A. Okay.<br/>4 Q. Okay. So let me just ask you, are -- are<br/>5 you -- are you speaking on behalf of the company for the<br/>6 reasons that Lennox alleges it terminated Mark Rakowski?<br/>7 MR. JORGENSEN: I'll jump in here. He is<br/>8 not. We are not -- the company has not designated<br/>9 Mr. Krutsch for -- for that topic.<br/>10 MR. SANFORD: All right.<br/>11 Q. So let me just ask you then as -- in your<br/>12 individual capacity.<br/>13 What is your understanding personally,<br/>14 not as a company representative, of Lennox's reasons or<br/>15 reason for firing Mark Rakowski?<br/>16 A. The -- the reason for Mark Rakowski's<br/>17 termination was as a result of his inability to<br/>18 effectively lead his team, engage his team, motivate his<br/>19 team from the aspect of -- of expected leadership<br/>20 behaviors of a -- of an executive leader at the<br/>21 organization.<br/>22 Q. How do you know that Lennox fired Mark<br/>23 Rakowski because of alleged inability to be an effective<br/>24 leader or engage his team?<br/>25 A. So that's the question, how -- how do I -- how</p> | <p style="text-align: right;">16</p> <p>1 resumed direct leadership because there was a vacancy in<br/>2 the manager of the department, that the morale, the<br/>3 engagement, and the satisfaction of the team was -- was<br/>4 declining as a result of his leadership style and the<br/>5 interactions he had with the team up to and including<br/>6 the process of backfilling the position with some<br/>7 potential internal candidates and how that was handled.<br/>8 And the conversations that Mark had with<br/>9 the team moving through that process resulted in<br/>10 employees resigning from the organization, making<br/>11 statements along the conversations of, I can't work<br/>12 for -- I can't work for somebody like that.<br/>13 Q. So who resigned saying that they can't work<br/>14 for someone like that?<br/>15 A. His name is Jason Lotsey.<br/>16 THE REPORTER: I'm sorry, repeat the last<br/>17 name?<br/>18 THE WITNESS: Lotsey, L-o-t-s-e-y.<br/>19 THE REPORTER: Thank you.<br/>20 Q. Who else?<br/>21 A. He was the -- he was the one resignation. The<br/>22 other was -- that applied for it, his name was Kyle<br/>23 Brown and he ultimately transferred to a different<br/>24 department.<br/>25 Q. And what did Kyle Brown tell you?</p>            |

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| <p style="text-align: right;">17</p> <p>1 A. The same thing, that he was informed -- what<br/> 2 ended up happening in that situation is he was informed<br/> 3 that the only time -- he -- <b>he told me, the only time</b><br/> 4 <b>that Mark comes up is when he is mad and there's a</b><br/> 5 <b>problem and he just points at the numbers and doesn't</b><br/> 6 <b>ask for any context or understand what we go through on</b><br/> 7 <b>a day-to-day basis; the only time he comes and talks to</b><br/> 8 <b>us is when he's mad at us.</b></p> <p>9 And then in result of the -- the<br/> 10 interviewing with him and Jason, they both were deemed<br/> 11 not ready for the job. <b>And they both spoke afterwards</b><br/> 12 <b>how that conversation went and both shared that he</b><br/> 13 <b>ultimately told them the same thing, that he was</b><br/> 14 <b>personally grooming each one of them for that position</b><br/> 15 <b>in the future, made the same -- in -- in their</b><br/> 16 <b>viewpoint, the same promise to each of them, in essence,</b><br/> 17 <b>being perceived to them as he was lying to them, and</b><br/> 18 <b>they can't work for somebody who's not going to be</b><br/> 19 <b>honest with them.</b></p> <p>20 Q. So I don't understand your -- what was the<br/> 21 lie?</p> <p>22 A. He told them that he personally picked them<br/> 23 and was going to be grooming them to take over the<br/> 24 position.</p> <p>25 Q. How was that the lie?</p> | <p style="text-align: right;">19</p> <p>1 to people on his team not being willing to work for him<br/> 2 as their leader.</p> <p>3 Q. So did you talk to other people on his team?</p> <p>4 A. Not a specific conversation that I -- that I<br/> 5 can recall.</p> <p>6 Q. So you didn't start an investigation as to<br/> 7 whether or not Mr. Kowalski [sic] was an effective<br/> 8 leader, engaged his team, had an ability to lead his<br/> 9 team?</p> <p>10 A. Well, I had general --</p> <p>11 MR. JORGENSEN: Objection, form.</p> <p>12 A. -- conversations with folks in passing and<br/> 13 stopping in my office regarding just my role as HR and<br/> 14 how things are going, you know, and they shared with me<br/> 15 frustrations that they'd had, stresses that they have in<br/> 16 the business, and we would -- we would talk through<br/> 17 them.</p> <p>18 I did not have a -- if you're saying do I<br/> 19 have a dedicated investigation on a -- on a specific<br/> 20 matter, I do not have one.</p> <p>21 Q. So just to be clear, did -- did you tell or<br/> 22 give -- did you tell Mark Rakowski that people were<br/> 23 accusing him of lying?</p> <p>24 A. I told him that they said that he had promised<br/> 25 them that he was grooming them for the job.</p> |
| <p style="text-align: right;">18</p> <p>1 A. Because he told that same thing to two people,<br/> 2 and you can't be personally grooming two people for the<br/> 3 same position, telling them that they're the one he has<br/> 4 chosen.</p> <p>5 Q. And so you talked to -- to Mark Rakowski about<br/> 6 that, whether or not that was true or not?</p> <p>7 A. I asked him what his conversations were with<br/> 8 them around that -- around the feedback. We aligned<br/> 9 prior to what the feedback was going to be, and that was<br/> 10 not the conversation that we aligned that he was going<br/> 11 to share with them.</p> <p>12 Q. And so you asked point blank Mark Rakowski,<br/> 13 why did you lie to these two gentlemen, or is it true<br/> 14 that you lied to these two gentlemen?</p> <p>15 A. I asked him what the conversation was with the<br/> 16 two gentlemen. He shared with me he did not share -- I<br/> 17 asked him if he -- if he committed to either one of them<br/> 18 that they would be selected, and he said that he did<br/> 19 not.</p> <p>20 Q. So you chose to believe the other two<br/> 21 individuals?</p> <p>22 A. They both shared the same story. As a result<br/> 23 of that, one of them quit regarding -- well, I'll --<br/> 24 I -- what I know is that the action, behavior, and the<br/> 25 conversations that Mark would have had with his team led</p>  | <p style="text-align: right;">20</p> <p>1 Q. And he told you that's not true?</p> <p>2 A. He said that is not what I said to them.</p> <p>3 Q. Let's talk about that you're -- you said that<br/> 4 you witnessed that -- well, first of all, before we do<br/> 5 that, anybody else besides Jason Lotsey and Kyle<br/> 6 Brown --</p> <p>7 MR. JORGENSEN: Objection, form.</p> <p>8 Q. -- on his team that you talked to that had<br/> 9 problems with him?</p> <p>10 A. On -- on his direct team?</p> <p>11 Q. Yes.</p> <p>12 A. I cannot think of a -- I -- I -- I can't think<br/> 13 of right now a specific conversation that I would have<br/> 14 had with somebody on his team directly in relation to<br/> 15 having a problem with Mark.</p> <p>16 Q. So then you said that he couldn't align with<br/> 17 the vice president, right?</p> <p>18 A. Yeah, with the vice president and general<br/> 19 manager.</p> <p>20 Q. And who was that?</p> <p>21 A. Joe Nassab.</p> <p>22 Q. How do you know he could not -- Mark Rakowski<br/> 23 could not align with Joe Nassab, the vice president and<br/> 24 general manager?</p> <p>25 A. Based on the conversation that I had with Mark</p>  |

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| <p style="text-align: right;">269</p> <p>1 questions for trial.</p> <p>2 THE REPORTER: The deposition is</p> <p>3 complete. At this time will counsel please state their</p> <p>4 stipulations with regard to custody of the transcript</p> <p>5 and any other pertinent matters you want on the record?</p> <p>6 MR. SANFORD: I'll keep the original.</p> <p>7 Do you want the opportunity to read and</p> <p>8 sign?</p> <p>9 MR. JORGENSEN: Yes, we do.</p> <p>10 MR. SANFORD: Okay.</p> <p>11 THE REPORTER: Okay. Off the record at</p> <p>12 5:19.</p> <p>13 (Proceedings concluded at 5:19 p.m.)</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>  | <p style="text-align: right;">271</p> <p>1 ACKNOWLEDGMENT OF DEPONENT</p> <p>2 I, _____, do hereby certify that I</p> <p>3 have read the foregoing pages, and that the same is a</p> <p>4 correct transcription of the answers given by me to the</p> <p>5 questions therein propounded, except for the corrections</p> <p>6 or changes in form or substance, if any, noted on the</p> <p>7 attached Errata.</p> <p>8</p> <p>9</p> <p>10 _____</p> <p>11 WITNESS NAME DATE</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> |          |                   |                   |   |       |       |       |   |       |       |       |   |       |       |       |   |       |       |       |   |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |  |
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| <p style="text-align: right;">270</p> <p>1 ERRATA</p> <p>2 WITNESS NAME: Baxter Krutsch</p> <p>3 DATE OF DEPOSITION: February 12, 2021</p> <p>4</p> <table border="1"> <thead> <tr> <th>PAGE NO.</th> <th>LINE NO.</th> <th>CHANGE</th> <th>REASON FOR CHANGE</th> </tr> </thead> <tbody> <tr><td>5</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>6</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>7</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>8</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>9</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>10</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>11</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>12</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>13</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>14</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>15</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>16</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>17</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>18</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>19</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>20</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>21</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>22</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>23</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>24</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>25</td><td>_____</td><td>_____</td><td>_____</td></tr> </tbody> </table> | PAGE NO.   | LINE NO. | CHANGE            | REASON FOR CHANGE | 5 | _____ | _____ | _____ | 6 | _____ | _____ | _____ | 7 | _____ | _____ | _____ | 8 | _____ | _____ | _____ | 9 | _____ | _____ | _____ | 10 | _____ | _____ | _____ | 11 | _____ | _____ | _____ | 12 | _____ | _____ | _____ | 13 | _____ | _____ | _____ | 14 | _____ | _____ | _____ | 15 | _____ | _____ | _____ | 16 | _____ | _____ | _____ | 17 | _____ | _____ | _____ | 18 | _____ | _____ | _____ | 19 | _____ | _____ | _____ | 20 | _____ | _____ | _____ | 21 | _____ | _____ | _____ | 22 | _____ | _____ | _____ | 23 | _____ | _____ | _____ | 24 | _____ | _____ | _____ | 25 | _____ | _____ | _____ | <p style="text-align: right;">272</p> <p>1 IN THE UNITED STATES DISTRICT COURT</p> <p>2 FOR THE EASTERN DISTRICT OF TEXAS</p> <p>3 SHERMAN DIVISION</p> <p>4 MARK RAKOWSKI, *</p> <p>5 Plaintiff, *</p> <p>6 vs. * Civil Action</p> <p>7 * No. 4:19-cv-0883-ALM</p> <p>8 LENNOX INTERNATIONAL, *</p> <p>9 INC., *</p> <p>10 Defendant. *</p> <p>11 *****</p> <p>12 REPORTER'S CERTIFICATION</p> <p>13 ORAL AND VIDEOTAPED DEPOSITION OF</p> <p>14 BAXTER KRUTSCH,</p> <p>15 INDIVIDUALLY AND AS CORPORATE REPRESENTATIVE OF</p> <p>16 LENNOX INTERNATIONAL, INC.</p> <p>17 FEBRUARY 12, 2021</p> <p>18 (Conducted Remotely via Zoom)</p> <p>19 *****</p> <p>20 I, CINDY DUTSCH, Certified Shorthand Reporter</p> <p>21 in and for the State of Texas, hereby certify to the</p> <p>22 following:</p> <p>23 That the witness, BAXTER KRUTSCH, was duly</p> <p>24 sworn by me and that the transcript of the oral</p> <p>25 deposition is a true record of the testimony given by</p> <p>26 the witness;</p> <p>27 I further certify that pursuant to FRCP Rule</p> <p>28 30(f) (1) that the signature of the deponent:</p> <p>29 _X_ was requested by the deponent or a party</p> |
| PAGE NO.  | LINE NO.   | CHANGE   | REASON FOR CHANGE |                   |   |       |       |       |   |       |       |       |   |       |       |       |   |       |       |       |   |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |  |
| 5   | _____  | _____    | _____             |                   |   |       |       |       |   |       |       |       |   |       |       |       |   |       |       |       |   |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |  |
| 6   | _____  | _____    | _____             |                   |   |       |       |       |   |       |       |       |   |       |       |       |   |       |       |       |   |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |  |
| 7   | _____  | _____    | _____             |                   |   |       |       |       |   |       |       |       |   |       |       |       |   |       |       |       |   |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |  |
| 8   | _____  | _____    | _____             |                   |   |       |       |       |   |       |       |       |   |       |       |       |   |       |       |       |   |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |  |
| 9   | _____  | _____    | _____             |                   |   |       |       |       |   |       |       |       |   |       |       |       |   |       |       |       |   |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |  |
| 10  | _____  | _____    | _____             |                   |   |       |       |       |   |       |       |       |   |       |       |       |   |       |       |       |   |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |  |
| 11  | _____  | _____    | _____             |                   |   |       |       |       |   |       |       |       |   |       |       |       |   |       |       |       |   |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |  |
| 12  | _____  | _____    | _____             |                   |   |       |       |       |   |       |       |       |   |       |       |       |   |       |       |       |   |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |  |
| 13  | _____  | _____    | _____             |                   |   |       |       |       |   |       |       |       |   |       |       |       |   |       |       |       |   |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |  |
| 14  | _____  | _____    | _____             |                   |   |       |       |       |   |       |       |       |   |       |       |       |   |       |       |       |   |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |  |
| 15  | _____  | _____    | _____             |                   |   |       |       |       |   |       |       |       |   |       |       |       |   |       |       |       |   |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |  |
| 16  | _____  | _____    | _____             |                   |   |       |       |       |   |       |       |       |   |       |       |       |   |       |       |       |   |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |  |
| 17  | _____  | _____    | _____             |                   |   |       |       |       |   |       |       |       |   |       |       |       |   |       |       |       |   |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |  |
| 18  | _____  | _____    | _____             |                   |   |       |       |       |   |       |       |       |   |       |       |       |   |       |       |       |   |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |  |
| 19  | _____  | _____    | _____             |                   |   |       |       |       |   |       |       |       |   |       |       |       |   |       |       |       |   |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |  |
| 20  | _____  | _____    | _____             |                   |   |       |       |       |   |       |       |       |   |       |       |       |   |       |       |       |   |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |  |
| 21  | _____  | _____    | _____             |                   |   |       |       |       |   |       |       |       |   |       |       |       |   |       |       |       |   |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |  |
| 22  | _____  | _____    | _____             |                   |   |       |       |       |   |       |       |       |   |       |       |       |   |       |       |       |   |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |  |
| 23  | _____  | _____    | _____             |                   |   |       |       |       |   |       |       |       |   |       |       |       |   |       |       |       |   |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |  |
| 24  | _____  | _____    | _____             |                   |   |       |       |       |   |       |       |       |   |       |       |       |   |       |       |       |   |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |  |
| 25  | _____  | _____    | _____             |                   |   |       |       |       |   |       |       |       |   |       |       |       |   |       |       |       |   |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |    |       |       |       |  |

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1 before the completion of the deposition and is to be  
2 returned within 30 days from date of receipt of the  
3 transcript. If returned, the attached Errata contain  
4 any changes and the reasons therefor;

5 \_\_\_\_\_ was not requested by the deponent or a  
6 party before the completion of the deposition.

7 I further certify that I am neither counsel  
8 for, related to, nor employed by any of the parties or  
9 attorneys to the action in which this proceeding was  
10 taken. Further, I am not a relative or employee of any  
11 attorney of record in this cause, nor am I financially  
12 or otherwise interested in the outcome of the action.

13 Subscribed and sworn to on this the 26th day  
14 of February, 2021.

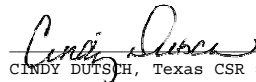
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